



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
ONE CONGRESS STREET, SUITE 1100  
BOSTON, MA 02114-2023

November 14, 2006

Mr. Andrew Silfer  
Corporate Environmental Programs  
General Electric Company  
159 Plastics Avenue  
Pittsfield, MA 01201

Via Electronic and U.S. Mail

Re: Conditional Approval of General Electric's September 13, 2005 *GMA 4 Groundwater Quality Monitoring Interim Report for Spring 2006*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter provides the Environmental Protection Agency's (EPA) conditional approval of GE's September 13, 2006 *GMA 4 Groundwater Quality Monitoring Interim Report for Spring 2006*. This letter is subject to the terms and conditions specified in the Consent Decree (CD) that was entered in U.S. District Court on October 27, 2000.

Pursuant to Paragraph 73 of the CD, EPA, after consultation with the Massachusetts Department of Environmental Protection (MDEP), approves the September 13, 2006 report, subject to the following conditions:

1. In the next GMA 4 Monitoring Report, GE shall include replacement monitoring well OPCA-MW-1R on all appropriate figures.
2. EPA does not agree with GE's proposed expedited fall 2006 sampling activities as discussed in Section 5.4. Rather, EPA and GE have discussed and agreed on a revised sampling proposal as documented in the attached September 25, 2006 email from Sharon Hayes to Richard Gates. GE shall implement the revised sampling proposal provided in the attached September 25, 2006 email.
3. EPA does not necessarily concur with all of the interpretations and conclusions GE presents in this submittal. In particular, GE's discussion on groundwater flow directions is plausible. However, there are other interpretations of the groundwater flow that are equally plausible. Similarly, EPA does not necessarily concur with all of GE's

analysis of groundwater data trends. For example, EPA notes that there may be a trend of increased dissolved PCB concentrations in OPCA monitoring wells OPCA-MW-1, OPCA-MW-4 and OPCA-MW-7. EPA will continue to evaluate the groundwater flow and contaminant data and will consider such information in our review of the final Baseline Assessment Report -- where GE will present its final groundwater evaluation and proposal for a long-term groundwater monitoring program. In addition, EPA reserves the right to require GE to perform additional response actions, if necessary, to meet the requirements of the CD.

4. EPA may install additional monitoring wells or piezometers on or adjacent to the Allendale School property. GE shall include EPA-generated groundwater elevation and/or chemical data from these monitoring wells or piezometers in developing water table contour and contaminant migration maps for future GMA 4 submittals.

EPA reserves its right to perform additional sampling and/or require additional sampling or Response Actions, if necessary, to meet the requirements of the CD.

If you have any questions, please contact me at (617) 918-1328.

Sincerely,



Sharon M. Hayes  
GE Facility Project Manager

Attachment

cc:

Dean Tagliaferro, EPA  
Tim Conway, EPA  
Rose Howell, EPA  
Holly Inglis, EPA  
Sue Steenstrup, MDEP  
Anna Symington, MDEP  
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Thomas Angus, MDEP  
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Tom Hickey, PEDA  
Rod McLaren, GE  
Mike Carroll, GE  
Richard Gates, GE  
James Nuss, BBL  
James Bieke, Goodwin Procter LLP  
Linda Palmieri, Weston Solutions  
Dale Young, MA EOEA  
Teresa Bowers, Gradient  
Jeffrey Bernstein, Bernstein, Cushner & Kimmell  
Public Information Repository (Berkshire Athenaeum)

Sharon Hayes/R1/USEPA/US

09/25/2006 04:35 PM

To richard.gates@corporate.ge.com

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bcc

Subject Response to GE's Request for Expedited GMA-4 Sampling

Dick,

As discussed, EPA is concerned with the current proposed because the GMA-4 Fall 2006 report would have data from 2 different collection dates, possibly up to 2 months apart. To avoid this issue, based on today's discussion, we have agreed to the following:

1. GE shall collect 3 expedited groundwater samples (for PCB analysis only) from the 3 wells located along Tyler Street Extension (GMA4-6, 78-6, and 78-1).
2. GE shall send the samples to two different labs for analysis (SGS and NEA).
3. GE shall provide at least 24 hours notice to EPA so Weston can collect split samples for PCB analysis by STL.
4. GE shall evaluate the results and data quality from SGS and NEA in order to determine which lab to use for subsequent analysis. GE shall also compare the SGS and NEA results with the STL results. GE shall submit a letter to EPA summarizing the findings and recommending a sampling strategy for the GMA-4 Fall 2006 round.
5. GE shall not initiate the GMA-4 Fall 2006 sampling round until the expedited samples have been collected, analyzed, and evaluated (most likely November 2006), and GE's subsequent sampling strategy for the GMA-4 Fall 2006 round has been approved by EPA.
6. GE shall collect samples from these 3 wells in addition to the remaining 9 wells during the GMA-4 Fall 2006 sampling round and analyze samples in accordance with previously approved submittals.

Please call me with any questions.

Thanks,

Sharon M. Hayes

US EPA - Region 1

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